



**U.S. Department of the Interior**  
**"To-Be" Trust Business Model**  
**Process Template**

**Title: Omnibus Reconciliation**

*Identify the process in the "Verb Noun" format. (Ex: Maintain Ownership)*

**Process Number**  
**FO.4**

**1. Process Definition** *Provide an overview of the process and define its starting and ending points*

<b>1.1 Starts With</b>	Analyze trust fund financial transactions and files to ensure data is captured accurately and accounts are in balance.
<b>1.2 Process Overview</b>	<p>All trust accounting activities are reconciled through a process that minimizes manual intervention. Beneficiary account, funds receivable and payable and cash management balances are reconciled with data from the trust accounting systems and other sources such as Treasury, Federal Financial System (FFS), the lockbox operation and investment custodians. The reconciliation ensures the sum of funds credited to and disbursed from beneficiary accounts equals funds received by the trust and distributed to beneficiary, escrow and administrative accounts or disbursed to beneficiaries or other parties.</p> <p>Omnibus reconciliation reconciles the control accounts (462-tribal account, 463-IIM account) to the total receipts and disbursements files and OTFM reconciles the subsidiary accounts with the daily receipts and disbursements.</p>
<b>1.3 Stops With</b>	Reconciliation of all financial activities for an accounting cycle.

**2. Trust Business Objectives** *Identify the Comprehensive Trust Model strategic goals and business objectives to which this process contributes.*

<b>Goal/Objective</b>
The ultimate goal for trust accounts reconciliation is to provide a system of checks and balances, insure integrity of financial data, and demonstrate accountability to beneficiaries and stakeholders.

**3. How should Beneficiaries be involved in this process?**

<b>Beneficiary Involvement</b>
None



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**4. Organizations, Offices and Roles.** *Identify the DOI organizations and related roles that should be involved in performing the process.*

**4.1 DOI Organizations.** *Identify the DOI organizations, offices and individual roles that contribute to this process.*

*DOI organizations include the Office of the Secretary, BIA, OST, BLM, MMS, OHA, OSM among others.*

*Offices include Central Offices, Regional Offices, Agency(Field) Offices, etc.*

*All individual roles that contribute, in a significant manner, should be identified.*

Organization	Office	Role	Contribution
BIA	Agency/Regional Offices		Provide information to assist in the reconciliation as requested.
OST	Field Operations		Provide information to assist in the reconciliation as requested.
MMS	Financial Management		Provide information to assist in the reconciliation as requested.
Tribes			Provide information to assist in the reconciliation as requested.
OST	Trust Service, Reporting and Reconciliation	(Management)	Plan, direct and administer the activities associated with the implementation of the trust financial accounting reconciliation policies, procedures and standards.  Oversee reconciliation process and review reconciliation reports for quality control.
OST	Trust Service, Reporting and Reconciliation	(Staff)	Perform daily, weekly and monthly omnibus reconciliation for trust cash and asset management accuracy.  Analyze the financial data to ensure accurate data is captured.  Reconcile control accounts with applicable subsidiary account information, identify balance discrepancies among the various accounts and reconcile with external financial institutions such as Treasury, banks, and other third parties.



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**4.2 Non-DOI Organizations.** *Identify the non-DOI organizations that support the execution or control of this process.*

External Organization	Contribution
Banks and lockbox operation	Provide financial information for reconciliation.
Treasury	Assist in reconciling transactions and fund balances as reported by DOI.
Custodians	Provide financial information for reconciliation.

**5. Event(s)** *Identify the events or conditions that start the process. Describe each event and indicate the frequency (daily, monthly, quarterly, etc.) in which each event is expected to occur. An event may be an external interaction (a beneficiary submits an application), the expiration of a period of time (a lease is due to expire in 90 days), or the realization of some pre-defined threshold (an IIM account reaches the automatic disbursement threshold).*

Event	Description	Estimated Frequency
Conclusion of trust financial operating cycle	Financial activity for an accounting cycle are completed.	Daily, weekly, monthly
Receive a management directive	Management makes an ad-hoc request for a reconciliation.	Daily, weekly, monthly

**6. Inputs and Outputs.** *Identify and describe all inputs and outputs related to this process. Inputs are information or materials used during the execution of the process; outputs are materials or information produced by the process.*

**6.1 Inputs**

Input	Description
TFAS data file	Record of financial transactions in an accounting cycle.
Fund receipt file	Detailed Information regarding funds received.
Funds receivable file	Detailed information regarding anticipated receipts.
Fund disbursement file	Detailed information regarding disbursements.
Funds payable file	Detailed information regarding anticipated obligations.
Beneficiary account file	Detailed financial activity transactions and account balance.



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Input	Description
Cash management file	Detailed financial activity regarding projected and actual receipts and disbursements for beneficiary accounts.
Treasury financial information	Detailed information, such as Cash Link, GOALS, RFC link, IPAC, Treasury statement of differences, etc.
Information from other sources	Detailed information from banks, tribes, and other sources.

**6.2 Outputs**

Output	Description
Various Treasury data reports	Daily and monthly cash reconciliation reports.
Interest reconciliation	Daily and/or monthly interest earnings and disbursement reconciliation.
House account balance	Monthly reconciliation of house account balances.
Overdraft Status Report	Monthly reconciliation (sent to agencies).
Month-End Unit Reconciliation	Reconciliation of total units per Bankers Trust, Bureau of Public Debt (securities held at Treasury and overnighters). Identifies and reconciles discrepancies between custodial units and the accounting systems.

**7. Fiduciary and Legal Obligations and Controls**

**7.1 Obligations**

*Identify and describe the legal and fiduciary obligations that impact this process. For each obligation, indicate the document or commitment that defines the obligation and the citation (paragraph or section) within the document that pertains to this process.*

Obligation	Source	Business Impact
Regulations and guidance for federal financial accounting and budgeting	Various OMB & treasury regulations, DOI guides and federal Accounting and Auditing Act	Ensure timely and accurate reconciliation and data quality and integrity.
Accountability of trust funds	Trust Reform Act 1994	Ensure timely and accurate reconciliation and data quality and integrity.



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Obligation	Source	Business Impact
Trust powers	12 USC 92a	Ensure timely and accurate reconciliation and data quality and integrity.
Time limits on government checks	PL 100-86 (Competitive Equality Banking Act of 1987)	Ensure timely and accurate reconciliation and data quality and integrity.
Guidance on cash and investment transactions	Treasury regulations	Safeguard trust assets.
Freedom of Information Act (FOIA)	5 USC 552	Provides specifically that "any person" can make requests for government information. Citizens who make requests are not required to identify themselves or explain why they want the information they have requested. All branches of the Federal government must adhere to the provisions of FOIA with certain restrictions for work in progress (early drafts), enforcement confidential information, classified documents, and national security information.
Privacy Act of 1974	5 USC 552 (a)	Protects information pertaining to individuals.

**7.2 Controls**

*Identify and describe any controls (enforcement mechanisms) that may be used to ensure that the process adheres to obligations and internal process requirements. Controls may be reviews, audits, segregated duties, etc. Indicate the reason that each control should be introduced (name the obligation that a control is intended to enforce; indicate any controls required to ensure consistency or reliability).*

Control	Reason	Description
Peer review, sampling, management control review and quality assurance	Ensure consistent adherence to financial procedures and accuracy of accounting entries.	Internal audits and checks.
Risk assessments	Ensure that risks are understood and mitigated as much as possible.	Measurement of quality assurance.
Generally Accepted Accounting Principles (GAAP)	Ensure that financial records meet industry standards and are auditable.	Accounting industry standards.
Federal Financial Accounting Standards	Ensure that financial records meet federal standards and are auditable.	Financial standards issued by the Federal Accounting Standards Advisory Board.



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Control	Reason	Description
DOI Accounting Handbook	Ensure standard department accounting practices.	Detailed desk procedures that include identified service standards and management overview to ensure service standards are met.
Federal Manager's Financial Integrity Act 1982 (FMFIA)	Ensure compliance with the requirements of internal accounting and administrative controls.	Federal financial standards.
Segregation of duties	Ensure exceptions are identified, aged and cleared.	Place accountability on program and integrated servicing offices to follow-up until exceptions are cleared.  Segregate receipting/disbursing cash from reconciliation of cash flow to the trust accounting system.  One person reconciling and another person reviewing reconciliations.
An internal audit control function is in place following OCC requirements to monitor processes	DOI consults with OCC to develop trust standards and regulations to ensure compliance with stated objectives.	Office of Controller of the Currency (OCC) - Regulation 9. Government financial standards.

**8. Mechanisms (Systems of Record)** *Identify the mechanisms, or systems, that are needed to support the process (ex: Ownership, Leasing, Workflow Management, Office Filing System, etc.). Indicate the information and activities, relevant to this process, that each system supports.*

System Name	Support
Trust Financial Accounting System (TFAS)	Technology that applies receipts, distributions and disbursements to the appropriate beneficiary and escrow accounts. An escrow tracking module is also included.
Funds receivable system	Technology that tracks payor commitments of funds, such as leases, judgment awards, sales, probate settlements, and receipts against those commitments. A cash management module that allocates projected and actual receipts to and from beneficiary accounts is also included.



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System Name	Support
Funds payable system	Technology system that records scheduled and actual disbursements from trust and trust-related accounts to beneficiaries or third parties. A cash management module that allocates projected and actual disbursements to and from beneficiary accounts is also included.
Treasury systems	Various Treasury systems including Cash Link, GOALS and RFC Link.
Intra Governmental Payments and Collections System (IPACS)	Technology that transfers funds between governmental departments, bureaus and agencies..

**9. Inter-Process Relationships** Identify other Trust processes that are related to this process (either predecessors or successors). If applicable, indicate the condition under which the processes are related.

**9.1 Predecessors.** Predecessors are processes that either produce information required by this process or that result in the need to execute this process.

Process No.	Name	Condition of Relationship
FO.1.2a	Receive and Post Trust Funds	Cash receipts activity.
FO.1.2b	Receive and Post Non-Trust Funds	Cash receipts activity.
FO.2.2	Pool and Sweep Funds for Short Term Investment	Investment activity.
FO.2.3	Execute Trades for Long Term Investment	Investment activity.
FO.3.5	Post Disbursements	Cash disbursement activity.

**9.2 Successors.** Successors are processes that either use information produced by this process or that must be executed as a result of performing this process.

Process No.	Name	Condition of Relationship
FO. 5	Reporting and Statements	Make available reconciled data to support accurate financial reports and beneficiary statements.



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- 10. Comments** *Summarize any discussion, problems, issues or recommendations that should be considered when reviewing process performance. Category Values (Note, Best Practice, Decision, Problem, Issue, Recommendation)*

Category	Comment
	None